

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DOUGLAS F. CARLSON
(DFC/USPS-T36-1-4)

The United States Postal Service hereby provides the responses of witness Mayo to the following interrogatories of Douglas F. Carlson: DFC/USPS-T36-1 to 4, filed on October 1, 2001. The Postal Service also may file a partial objection to interrogatory DFC/USPS-T36-1, depending on the results of its review of Office of the Inspector General audit reports.

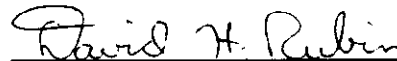
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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October 15, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO TO
INTERROGATORIES OF DOUGLAS F. CARLSON (DFC/USPS-T36-1-4)**

DFC/USPS-T36-1. Please provide all facts, information, and documents of which you or the Postal Service are aware that describe problems with the quality of certified mail service. This interrogatory specifically includes problems with delivery of certified mail to large-volume recipients. This interrogatory also specifically includes responsive media reports of which the Postal Service is aware. Documents dated prior to January 1, 1996, do not need to be produced.

RESPONSE:

Please see the Postal Service's response to USPS/DBP-102, Attachment 1 to DFC/USPS-118 (even though it was not accepted as an interrogatory), and USPS-LR-I-200 in Docket No. R2000-1; along with my responses to OCA-USPS-T36-1, 2, and 7, and the Postal Service's responses to DFC/USPS-1 and 2, in this docket. Also see the Notice of United States Postal Service of Review of Responses to Interrogatories DFC/USPS-1 and 2, filed October 12, 2001.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO TO
INTERROGATORIES OF DOUGLAS F. CARLSON (DFC/USPS-T36-1-4)**

DFC/USPS-T36-2. Please refer to your testimony at page 56, lines 4-5. Please provide all facts, information, and documents that support your statement that "concerns about unreliable service" for return-receipt service "imply a lower cost coverage." Documents dated prior to January 1, 1996, do not need to be produced.

RESPONSE:

Information that formed my opinion includes Docket No. R2000-1, PRC Op. at. 578, my Docket No. R2000-1 responses to DFC/USPS-T39 - 3, 4, and 24, and DBP/USPS-T-39 – 102, 131, 132, 133, 134, 192, and 193, my Docket No. R2000-1 testimony – USPS-T-39 at 135, and Docket No. R97-1, PRC Op. at 577.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO TO
INTERROGATORIES OF DOUGLAS F. CARLSON (DFC/USPS-T36-1-4)**

DFC/USPS-T36-3. Please refer to your testimony at pages 29-30, where you discuss the proposed classification changes for certified mail. Suppose the Commission recommends your proposed classification changes, but with one addition: the Postal Service also will make available to customers a copy of the signature of the person or entity that accepted delivery of the item. Please explain all reasons why the Postal Service would or would not support this recommendation from the Commission.

RESPONSE:

I cannot predict how Postal Service management or the Governors would react to any particular Commission recommendation.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO TO
INTERROGATORIES OF DOUGLAS F. CARLSON (DFC/USPS-T36-1-4)**

DFC/USPS-T36-4. Please confirm that the proposed change to DMCS § 945.11, which you discuss in your testimony at page 59, suggests that the electronic return receipt will provide the address of delivery, if it is different from the address on the mail piece, while your testimony at page 57-58 states that electronic return receipts will not provide the address information.

RESPONSE:

Confirmed. I will be revising pp. 57-58 of my testimony and this revision will be filed shortly.

DECLARATION

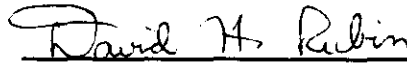
I, Susan W. Mayo, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Susan W Mayo

Dated: OCTOBER 15, 2001

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


David H. Rubin

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